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**Electronically Filed  
by Superior Court of CA,  
County of Santa Clara,  
on 2/19/2021 10:26 AM  
Reviewed By: M. Sorum  
Case #18CV334547  
Envelope: 5873052**

6 Attorneys for Defendant  
SAN FRANCISCO SCIENCE FICTION  
7 CONVENTIONS, INC.

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SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF SANTA CLARA

JONATHAN DEL ARROZ,  
Plaintiff,

Case No. 18-CV-334547

v.

**DEFENDANT’S NOTICE OF MOTION  
AND MOTION FOR SUMMARY  
JUDGMENT [C.C.P. 437C]**

SAN FRANCISCO SCIENCE FICTION  
CONVENTIONS, INC. (“SFSFC”) aka  
“WORLDCON76” David W. Gallaher (2019),  
President; David W. Clark (2020), Vice  
President; Lise Detusch Harrigan (2020),  
Treasurer; Kevin Standlee (2018), Secretary;  
Sandra Childress (2019); Bruce Farr (2018),  
Chair; 2018 SMOF Con Committee; Cheryl  
Morgan (2020); Kevin Roche (2018), Chair;  
2018 Worldcon (Worldcon 76) Committee;  
Cindy Scott (2018); Randy Smith (2019),  
Chair; New Zealand 2020 Worldcon Agent  
Committee; Andy Trembley (2020); Jennifer  
“Radar” Wylie (2019), Chair; CostumeCon  
2021 Organizing Committee; Lori  
Buschhaum; Susie Rodriguez and DOES 1  
through 30, inclusive.,

*[Filed Concurrently with Memorandum of  
Points and Authorities, Separate Statement of  
Undisputed Facts, Declarations of Kevin  
Roche and Lindsey Pho, and Request for  
Judicial Notice, along with accompanying  
exhibits]*

Assigned to: Honorable Socrates P.  
Manoukian, Dept 20

Date: May 11, 2021  
Time: 9:00 a.m.  
Dept.: 20  
Judge: Honorable Socrates P. Manoukian

Action Filed: April 16, 2018  
Trial Date: June 14, 2021

Defendants.

TO: ALL THE PARTIES AND THEIR ATTORNEYS OF RECORD:


YOU ARE HEREBY NOTIFIED that on May 11, 2021, at the hour of 9:00 a.m.,  
Department 20 of the above-entitled court located at 191 North First Street, San Jose, CA 95113,  
before the Honorable Socrates P. Manoukian, Defendant San Francisco Science Fiction  
Conventions, Inc., will, and hereby does, move the Court for summary judgment on the remaining

1 claim, for defamation, asserted against it in Plaintiff's Complaint, based upon California Code of  
2 Civil Procedure §437c, as well as on the grounds stated herein and in the Memorandum of Points  
3 and Authorities filed concurrently herewith. Plaintiff cannot establish a triable issue of fact for all  
4 the elements of his Fifth Cause of Action for defamation. Further, truth is a complete defense to  
5 defamation and bars all recovery in this case.

6 This motion will be based on this Notice, as well as the contemporaneously filed herewith  
7 Memorandum of Points and Authorities, the Separate Statement of Undisputed Material Facts  
8 pursuant to California Rule of Court 3.1350(h), the supporting Declaration of Kevin Roche, the  
9 supporting Declaration of Lindsey Pho, Request for Judicial Notice, the Court's own records and  
10 files, and such oral argument as the Court may entertain at the hearing of this motion.

11 Dated: February 19, 2021

MESSNER REEVES LLP

12  
13 By:   
14 ANH A. P. NGUYEN  
15 LINDSEY V. PHO  
16 Attorneys for Defendant  
17 SAN FRANCISCO SCIENCE FICTION  
18 CONVENTIONS, INC.  
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